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4
5 UNITED STATES DISTRICT COURT
FOR WESTERN DISTRICT OF WASHINGTON-SEATTLE

6
7 UNITED STATES OF AMERICA,

8 Plaintiff,

9 v.

10 ERIC KAPUSY,

11 Defendant.

)
)
) No. CR25-00001 KKE
)

) UNOPPOSED MOTION TO CONTINUE
) TRIAL AND RESET MOTIONS DEADLINE

) [CLERK'S ACTION REQUIRED]
)

12 Eric Kapusy, by his attorney, Jeffrey L. Kradel, does hereby move for a continuance of the
13 trial date in this matter from March 10, 2025, to April 28, 2025, and to reset the pretrial motions
14 deadline to March 24, 2025. The Government, through Assistant United States Attorneys Laura
15 Harmon, has indicated by email that it does not oppose the continuance.

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17 This continuance is requested to give undersigned counsel sufficient time to complete
18 necessary motion and trial preparation. The defense investigation of the case is ongoing, and
19 additional discovery from ongoing searches by law enforcement is expected. The defense
20 anticipates utilizing multiple expert witnesses as well, and the process of identifying and retaining
21 those experts is ongoing.

22 The defense believes a failure to grant a continuance of the trial date would deny the
23 defense the time necessary for effective preparation, taking into account the exercise of due
24 diligence, and that the ends of justice would be served by granting this continuance and
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UNOPPOSED MOTION TO CONTINUE
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1 outweigh the best interests of the public and the defendant in a speedy trial. 18 U.S.C. sec.
2 3161(h)(7)(B)(iv).

3 Mr. Kapusy has agreed to a continuance of the trial date, and has executed a Waiver of
4 Speedy Trial rights under the Sixth Amendment and the Speedy Trial Act, 18 U.S.C. sec. 3161-
5 3174. That waiver will be filed separately.

6 DATED this 30th day of January, 2025.

8 KRADEL DEFENSE PLLC

9 Attorney for
10 /s Jeffrey Kradel
11 Jeffrey L. Kradel, WSBA #26767
12 1455 NW Leary Way, Suite 400
13 Seattle, WA 98107
14 jeff@kradeldefense.com

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17 Certificate of Service

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19 I hereby certify that on January 29, 2025, I electronically filed the foregoing with the Clerk of
20 the Court using the CM/ECF System which will send notification of such filing to all
21 registered parties, including AUSA Laura Harmon.

22 Dated this 30th day of January, 2025.

23 /s Jeffrey Kradel